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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

AUG 03 2021

SEAN F. McAVOY, CLERK
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SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

KYLE RAY CAMPBELL,
CAMERON EARL CAMPBELL,
LEANN MARIE WAKE, and
CASEY RAY BOCKMAN,

Defendants.

4:20-CR-6018-SAB

SUPERSEDING INDICTMENT

Vio.: 21 U.S.C. § 846,
Conspiracy to Distribute 400
Grams or More of Fentanyl
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(A)(vi),
Possession with the Intent to
Distribute 400 Grams or More
of Fentanyl (Count 2)

21 U.S.C. § 841(a)(1),
(b)(1)(C),
Distribution of Fentanyl
(Counts 3-4)

21 U.S.C. § 841(a)(1),
(b)(1)(B)(vi),
Possession with the Intent to
Distribute 40 Grams or More
of Fentanyl (Count 5)

18 U.S.C. § 924(c)(1)(A),
Possession of a Firearm in
Furtherance of Drug
Trafficking (Count 6)

18 U.S.C. § 2232(a),
Attempted Destruction of
Evidence to Prevent Search or
Seizure
(Count 7)

21 U.S.C. § 853, 18 U.S.C. §
924(d)(1), 28 U.S.C. §
2461(c),
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Beginning on a date unknown but by on or about October 2019, continuing until on or about June 16, 2020, in the Eastern District of Washington and elsewhere, the Defendants, KYLE RAY CAMPBELL, CAMERON EARL CAMPBELL, LEANN MARIE WAKE, and CASEY RAY BOCKMAN, did knowingly and intentionally combine, conspire, confederate and agree together with each other and other persons, both known and unknown to the Grand Jury, to commit the following offense: distribution of 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi); all in violation of 21 U.S.C. § 846.

COUNT 2

On or about February 12, 2020, in the Eastern District of Washington, the Defendant, CAMERON EARL CAMPBELL, knowingly and intentionally possessed with the intent to distribute 400 grams or more of a mixture or substance

1 containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
2 propanamide (aka Fentanyl), a Schedule II controlled substance, in violation of 21
3 U.S.C. § 841(a)(1), (b)(1)(A)(vi).

4 COUNT 3

5 On or about October 17, 2019, in the Eastern District of Washington, the
6 Defendants, CASEY RAY BOCKMAN and LEANN MARIE WAKE, knowingly
7 and intentionally distributed a mixture or substance containing a detectable amount
8 of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a
9 Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

10 COUNT 4

11 On or about October 29, 2019, in the Eastern District of Washington, the
12 Defendants, CASEY RAY BOCKMAN and LEANN MARIE WAKE, knowingly
13 and intentionally distributed a mixture or substance containing a detectable amount
14 of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a
15 Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

16 COUNT 5

17 On or about July 1, 2020, in the Eastern District of Washington, the
18 Defendants, KYLE RAY CAMPBELL and LEANN MARIE WAKE, knowingly
19 and intentionally possessed with the intent to distribute 40 grams or more of a
20 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-
21 phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a Schedule II controlled
22 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi).

23 COUNT 6

24 On or about July 1, 2020, in the Eastern District of Washington, the
25 Defendants, KYLE RAY CAMPBELL and LEANN MARIE WAKE, did
26 knowingly possess firearms, that is:

- 27 – a Ruger Model 10/22 .22 caliber rifle bearing serial number 824-11385;

1 Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21
2 U.S.C. § 841, as set forth in this Superseding Indictment, Defendants KYLE RAY
3 CAMPBELL, CAMERON EARL CAMPBELL, LEANN MARIE WAKE, and
4 CASEY RAY BOCKMAN, shall forfeit to the United States of America, any
5 property constituting, or derived from, any proceeds obtained, directly or
6 indirectly, as the result of such offense and any property used or intended to be
7 used, in any manner or part, to commit or to facilitate the commission of the
8 offense. The property to be forfeited includes, but is not limited to:

9 Defendant CASEY RAY BOCKMAN (Counts 1, 3 and 4)

10 All that lot or parcel of land, together with its buildings,
11 appurtenances, improvements, fixtures, attachments and
12 easements, known as 420 South Grant Street, Kennewick,
13 Washington, legally described as follows:

14 Mary Ann Addition, Block 1, Lot 5. Protective
15 Covenants, 1-26-72.

16 Assessor's Property Tax Parcel: 1-0489-303-0001-
17 005


18 If any of the property described above, as a result of any act or omission of
19 the Defendants:


- 20
- 21 a. cannot be located upon the exercise of due diligence;
 - 22 b. has been transferred or sold to, or deposited with, a third party;
 - 23 c. has been placed beyond the jurisdiction of the court;
 - 24 d. has been substantially diminished in value; or
 - 25 e. has been commingled with other property which cannot be divided
26 without difficulty,

27 the United States of America shall be entitled to forfeiture of substitute property
28 pursuant to 21 U.S.C. § 853(p).

1 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction
2 of an offense in violation of 18 U.S.C. § 924(c)(1)(A), as set forth in Count 6 of
3 this Superseding Indictment, Defendants KYLE RAY CAMPBELL and LEANN
4 MARIE WAKE, shall forfeit to the United States of America any firearms and
5 ammunition involved or used in the commission of the offense.

6 DATED this 3 day of August 2021.

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14 Joseph H. Harrington
Acting United States Attorney

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18 Caitlin Baunsgard
Assistant United States Attorney
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